

## Attachment A: NAB Survey



## **2015 ENHANCED ENT SURVEY REPORT**

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# Table of Contents

## **Introduction and Methods**

## **Discussion and Analysis**

### **Overview**

### **Compliance with the FCC's 2014 ENT Best Practices**

### **Complaints Regarding Programming Captioned Using ENT**

### **Switching from ENT to Real-Time Captioning**

### **Primary Reasons for Choosing Enhanced ENT**

### **Investigating the Cost of Real-Time Captioning**

### **Hourly Cost of Real-Time Captioning**

### **Weekly Hours of Original News Programming**

### **Annual Cost of Real-Time Captioning**

## **Appendix**

### **List of Survey Questions**

## Introduction and Methods

Under the existing rules of the Federal Communications Commission (FCC or Commission), only the major national broadcast television networks (i.e., ABC, CBS, Fox and NBC) and affiliates of those stations in the top 25 markets must use real-time captioning in order to comply with the closed captioning rules. Remaining stations may use so-called Electronic Newsroom Technique (ENT) to convert the dialogue included in a teleprompter script into captions for their news programming. In close cooperation with representatives of the hearing impaired community, the National Association of Broadcasters (NAB) helped the Commission craft rules designed to improve the overall television viewing experience of captioning users while preserving the ability of small and medium market television stations to utilize ENT. Noting particularly the cost considerations and challenges associated with real time captioning, and the potential for a real time captioning requirement to result in a diminution of local news programming, the Commission ultimately adopted a set of best practices known as “Enhanced ENT.” The Enhanced ENT requirements became effective on June 30, 2014.

The Commission also required broadcasters to assess their Enhanced ENT efforts and to submit an analysis in the form of a report from NAB by October 28, 2015. This summarizes the television station survey conducted by NAB to gather feedback from television stations regarding their Enhanced ENT efforts to include in the October 2015 report.

In July 2015, television stations were invited to participate in the 2015 Enhanced ENT Survey. The population of stations surveyed included all full-power commercial and non-commercial television stations in Nielsen Designated Market Areas (DMAs) smaller than 25 in addition to full-power commercial and non-commercial television stations not affiliated with ABC, CBS, NBC or Fox in DMAs 1-25. Each station was asked to complete an online questionnaire that requested information related to utilization of ENT, complaints received regarding ENT and costs associated with ENT. Invitations were sent via electronic mail to management personnel at individual television stations in addition to key personnel at companies that operate multiple television stations. The public accounting firm of Hungerford Nichols CPAs + Consultants (Hungerford) administered the survey. All responses were collected by Hungerford via the online questionnaires in July, August and September 2015.

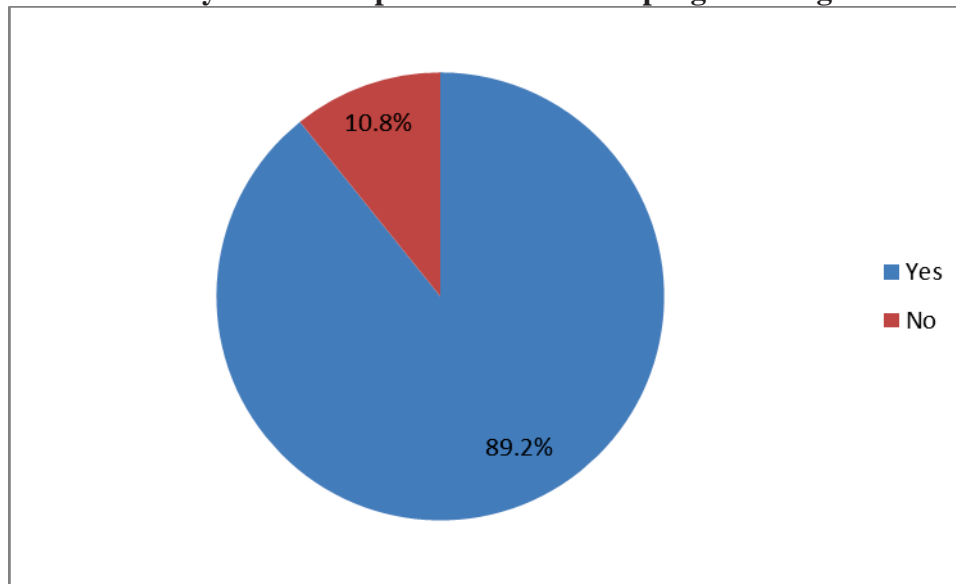
Of the 1,288 television stations invited to participate in the survey, 445 stations provided usable survey responses, resulting in a 34.55% overall response rate. The following discussion summarizes the responses provided respondents.

# Discussion and Analysis

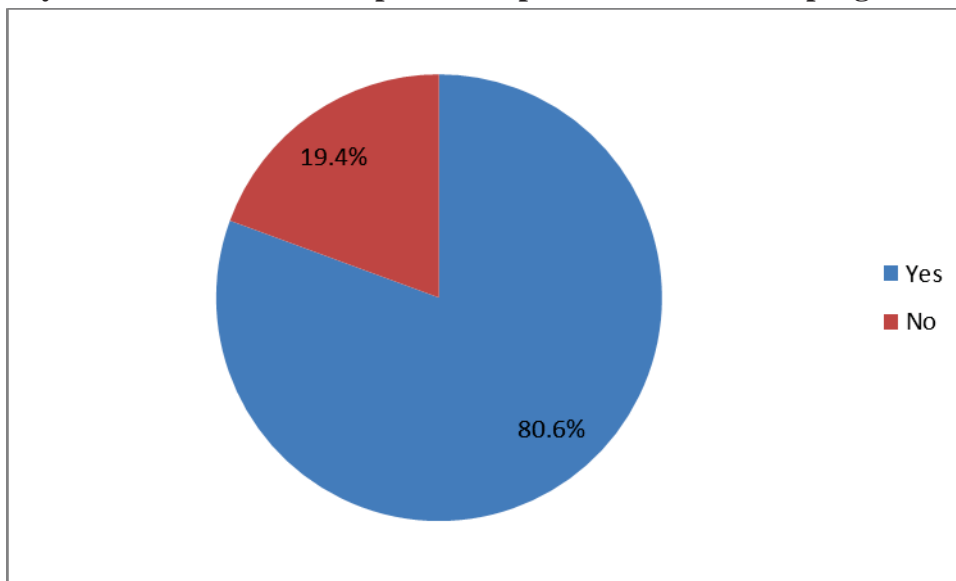
## Overview

Of the 445 stations that responded to the survey, 397 indicated that their station produces local news programming. Of the 397 stations that produce local news programming, 320 stations indicated that they use ENT to provide captions for local news programming.

**“Does your station produce local news programming?”**



**Among Respondents that Produce Local News Programming:  
“Does your station use ENT to provide captions for local news programming?”**



Two stations that do not produce local news programming indicated that they utilize ENT. Thus, 322 respondents indicated that they utilize ENT. Because survey questions apply only to those stations using ENT, the remainder of the analysis focuses on the 322 respondents that utilize ENT.

## Compliance with the FCC's 2014 ENT Best Practices

Respondents were asked if their station had complied with the FCC's 2014 ENT Best Practices by implementing specific measures. The following table quantifies which measures have been implemented by the 322 respondents that utilize ENT. Responses were not mutually exclusive; respondents were permitted to select all implementation measures that apply.

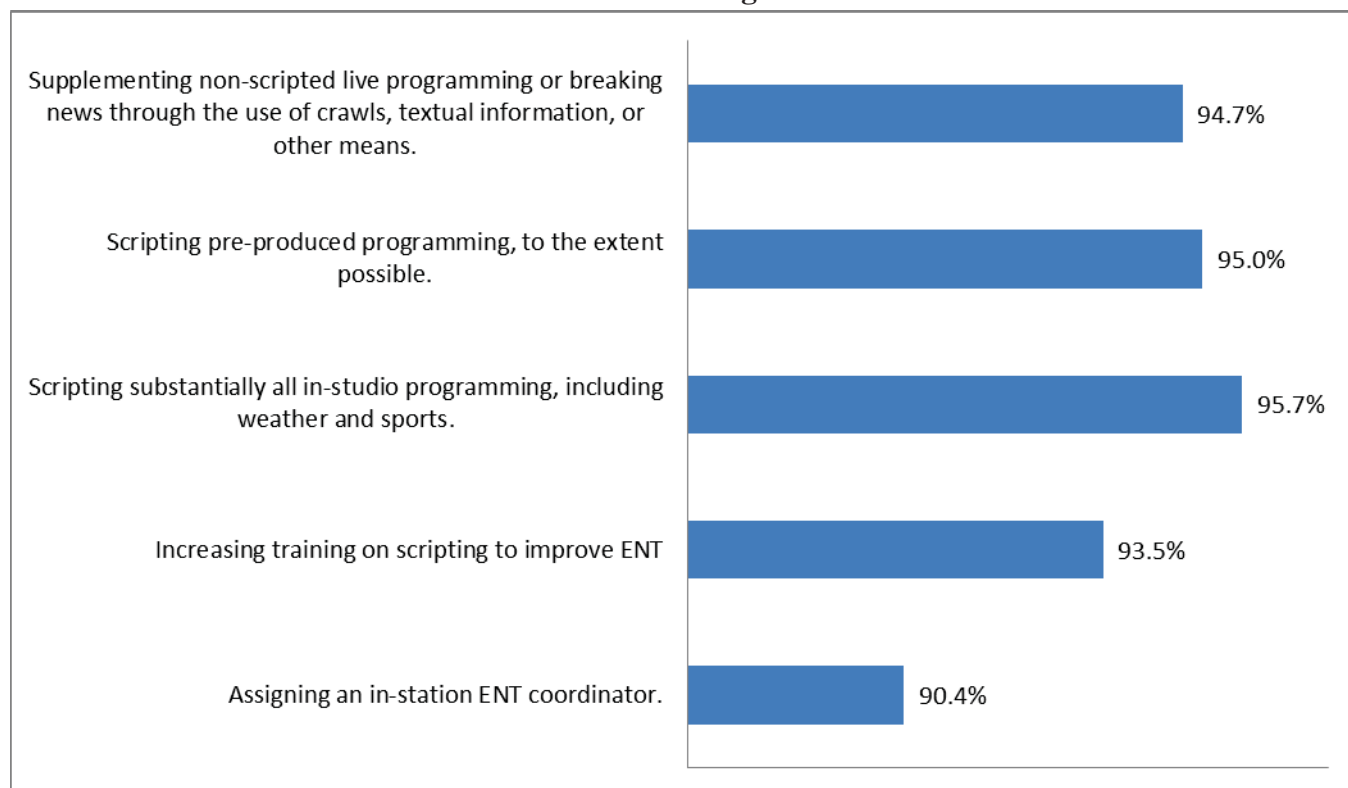
### **Among the 322 Respondents that Utilize ENT:**

**“Have you complied with the FCC's 2014 ENT Best Practices (Enhanced ENT) by implementing any of the following?”**

Assigning an in-station ENT coordinator.	291	90.4%
Increasing training on scripting to improve ENT	301	93.5%
Scripting substantially all in-studio programming, including weather and sports.	308	95.7%
Scripting pre-produced programming, to the extent possible.	306	95.0%
Supplementing non-scripted live programming or breaking news through the use of crawls, textual information, or other means.	305	94.7%

### **Among the 322 Respondents that Utilize ENT:**

**“Have you complied with the FCC's 2014 ENT Best Practices (Enhanced ENT) by implementing any of the following?”**

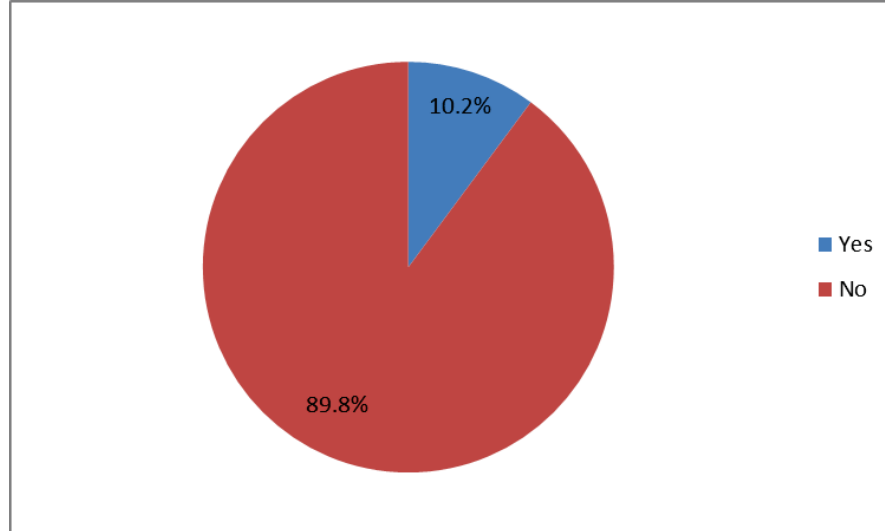


## Complaints Regarding Programming Captioned Using ENT

Respondents were asked if their station had received complaints about programming captioned using ENT since June 30, 2014. Of the 322 respondents that utilize ENT, 289 stations have not received complaints.

### **Among the 322 Respondents that Utilize ENT:**

**“Since June 30, 2014, have you received complaints about programming captioned using ENT?”**



The 33 respondents that reported complaints were asked how many complaints they have received since June 30, 2014. The following table summarizes the range of occurrences that was reported by respondents.

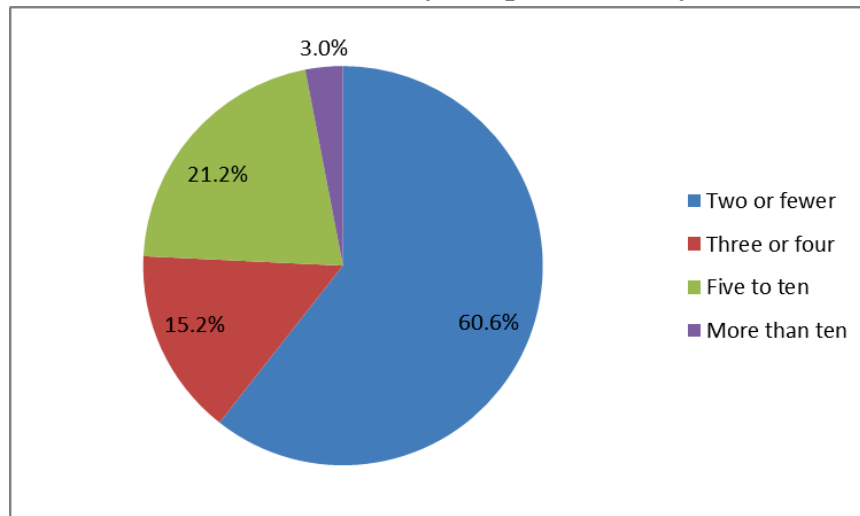
### **Among the 33 Respondents that Received Complaints:**

**“Since June 30, 2014, how many complaints have you received?”**

Two or fewer	20	60.6%
Three or four	5	15.2%
Five to ten	7	21.2%
More than ten	1	3.0%

### **Among the 33 Respondents that Received Complaints:**

**“Since June 30, 2014, how many complaints have you received?”**



## **Primary Reasons for Choosing Enhanced ENT**

Respondents were asked about the primary reason their station has chosen Enhanced ENT to comply with the FCC’s captioning regulations. More than nine-in-ten respondents selected “Cost” as the primary reason their station has chosen Enhanced ENT. The following table quantifies the reasons cited by the 322 respondents that utilize ENT. Responses were not mutually exclusive; respondents were permitted to select all reasons that apply.

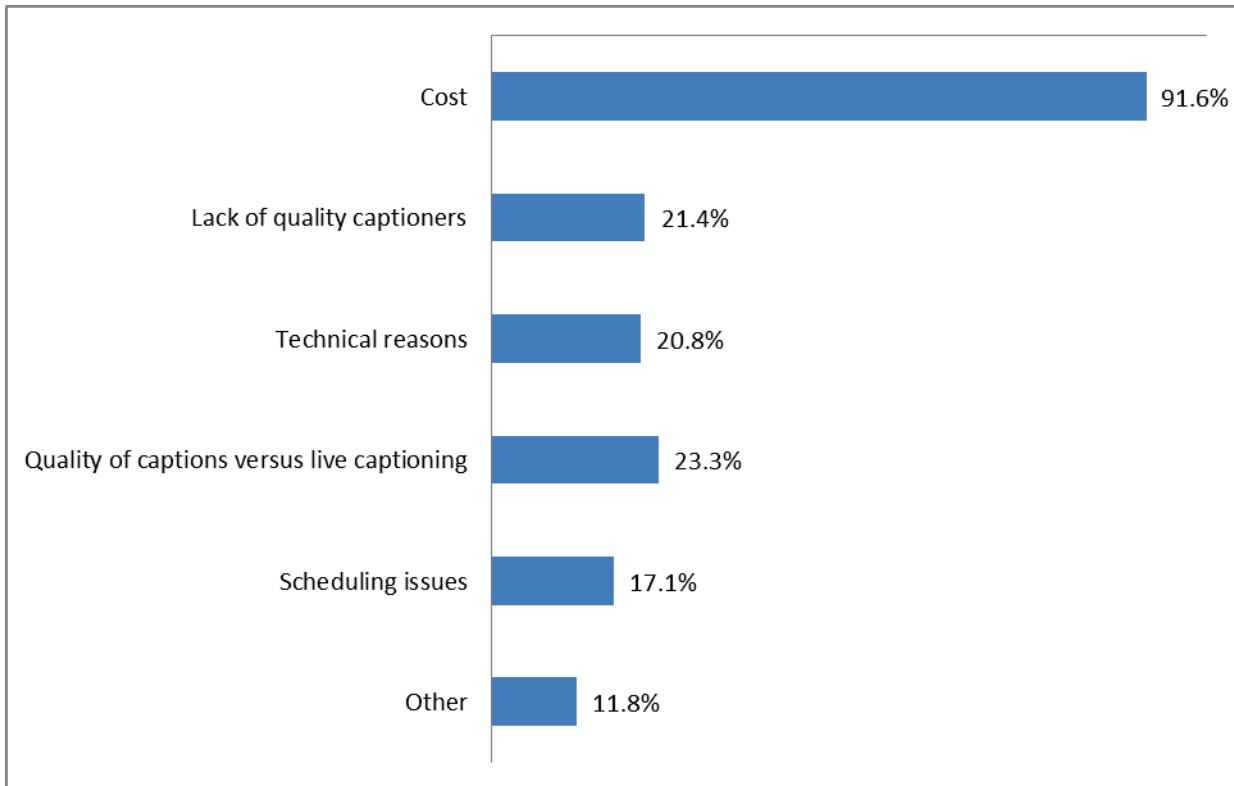
### **Among the 322 Respondents that Utilize ENT:**

**“What are the primary reasons your station has chosen to use Enhanced ENT to comply with the FCC’s captioning regulations?”**

Cost	295	91.6%
Lack of quality captioners	69	21.4%
Technical reasons	67	20.8%
Quality of captions versus live captioning	75	23.3%
Scheduling issues	55	17.1%
Other	38	11.8%

### **Among the 322 Respondents that Utilize ENT:**

**“What are the primary reasons your station has chosen to use Enhanced ENT to comply with the FCC’s captioning regulations?”**





## Primary Reasons for Choosing Enhanced ENT (continued)

Respondents that indicated “other” reasons for choosing Enhanced ENT were provided with the opportunity to describe these reasons. The following table lists the unedited textual comments provided by respondents.

Respondent	Actual Textual Response
1	Parent Company Policy
2	We already live caption some newscasts
3	trying ot [SIC] do what is asked of us and provide quality system
4	Time difference in Alaska means few operators available
5	Satisfied with current ENT service
6	We currently live caption appx. 40% of all live programming. Rest is ENT
7	Our talent runs the prompter at the speed they are reading making the timing of the captioning accurate.
8	[station call letters redacted] does not have local news
9	We do live captioning as well as ENT, its a mix.
10	Corporate decision
11	Market Size
12	We use both ENT and real time captioning.
13	We are using real time captioning, ENT is a backup
14	We are using real-time captiong services, ENT is a backup
15	Switchng [SIC] to live captioning within the next month.
16	Switchng [SIC] to live captioning within the next month.
17	Switchng [SIC] to live captioning within the next month.
18	We use both ENT and Real Time captioning here. ENT was available first due to technology. RT has been added recently
19	We use both ENT and Real Time captioning here. ENT was available first due to technology. RT has been added recently
20	We only caption 1 hour of news using ENT and that is 5am-6am the rest is live captioned
21	Already switched to live CC
22	We use real time captioning always except for morning news from 5:00-5:30 am (Mon-Fri) where we use ENT
23	on the company list to do so but haven't yet
24	time lag for live captioning
25	time lag for live captioning
26	We used it outside the mandated time periods
27	We produce captions via scripts using CaptionMic with a live operator for each show. The operator voices the captions when there is no Script
28	We use ENT during the 4:30 - 6am news then use Real time CC for all news after that to reduce costs
29	We do use live captionin during breakng weather and news coverage
30	We actually use a combination of live captioning and ENT. We find the ENT to be more accurate.
31	We use live captioning because of a grant through the State of [state name redacted]. If not for the grant, we could not afford live captioning.
32	We use a live captioning service when ENT is not adequate
33	[station call letters redacted] does use live captioners for news programs with unscripted guests and breaking news/weather
34	[no response provided]
35	To provide full compliance with FCC Guidelines.
36	It's way to expensive to purchase live captioning for a station our size. The technological solutions aren't accurate enough to comply with the accuracy rules.
37	We use ENT captioning in 2 instances; to CC local news that is broadcast outside of the required CC time window (2am-6am) and to add CC to pre-produced local programming. Our AM news airs from 4:30am-9:00am. ENT captioning is only used from 4:30am-6:00am, then at 6am we switch to a live CC service.
38	Already putting in scripts for anchors, reporters, weather etc. so it's more efficient

## Switching from ENT to Real-Time Captioning

Respondents were asked if their station has considered switching from ENT to real-time captioning. Of the 322 respondents that utilize ENT, 185 reported that they have considered switching from ENT to real-time captioning. Thus, 57.5% of respondents that utilize ENT reported that they have considered switching.

## Investigating the Cost of Real-Time Captioning

Respondents that do not already use real-time captioning for other purposes (such as during emergencies) were asked if they have investigated the cost of real-time captioning (e.g., contacting one or more vendors or soliciting sponsorships). Of the 322 respondents that utilize ENT, 287 indicated that they have investigated the cost of real-time captioning, 30 reported that they have not investigated the cost and five respondents did not answer the question.

### Hourly Cost of Real-Time Captioning

Respondents were asked the following question: Approximately how much money per hour do you estimate you would pay for real-time captioning (or how much do you currently pay) for real-time captioning? The following table summarizes the hourly cost ranges reported by the 322 respondents that utilize ENT.

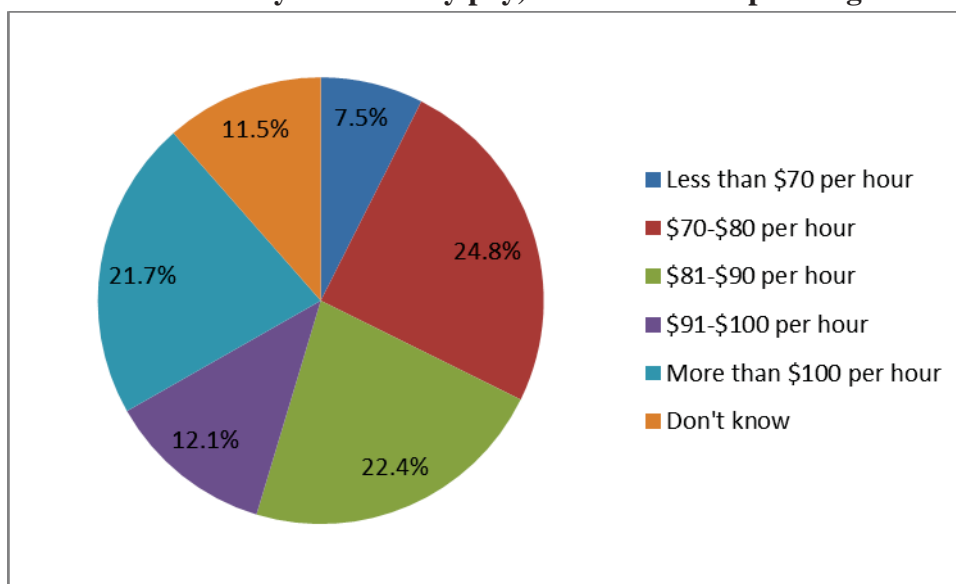
#### **Among the 322 Respondents that Utilize ENT:**

**“Approximately how much money per hour do you estimate you would pay for real-time captioning (or how much do you currently pay) for real-time captioning?”**

Less than \$70 per hour	24	7.5%
\$70-\$80 per hour	80	24.8%
\$81-\$90 per hour	72	22.4%
\$91-\$100 per hour	39	12.1%
More than \$100 per hour	70	21.7%
Don't know	37	11.5%

#### **Among the 322 Respondents that Utilize ENT:**

**“Approximately how much money per hour do you estimate you would pay for real-time captioning (or how much do you currently pay) for real-time captioning?”**



## Weekly Hours of Original News Programming

Respondents were asked to report the average number of hours of original news programming (not repeats) that their station delivers each week. A majority of respondents (84.2 percent) said they produce more than 20 hours of original news programming each week. The following table summarizes the ranges reported by the 322 respondents that utilize ENT.

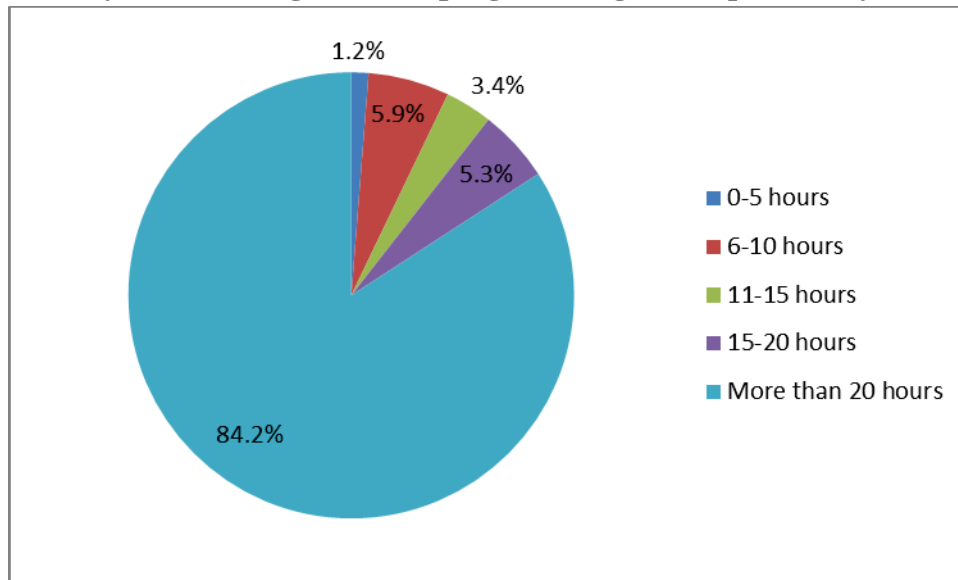
### **Among the 322 Respondents that Utilize ENT:**

**“On average, how many hours of original news programming (not repeats) do you deliver each week?”**

0-5 hours	4	1.2%
6-10 hours	19	5.9%
11-15 hours	11	3.4%
15-20 hours	17	5.3%
More than 20 hours	271	84.2%

### **Among the 322 Respondents that Utilize ENT:**

**“On average, how many hours of original news programming (not repeats) do you deliver each week?”**



## Annual Cost of Real-Time Captioning

Respondents were asked the following question: Based on your current cost to use ENT, your estimated hourly cost of captioning, and the quantity of programming you deliver, approximately how much would switching from ENT to real-time captioning for all your news programming cost? Seven-in-ten stations indicated switching from ENT to real-time captioning for all their news programming would cost more than \$100,000 annually. The following table summarizes the annual cost estimate ranges reported by the 322 respondents that utilize ENT.

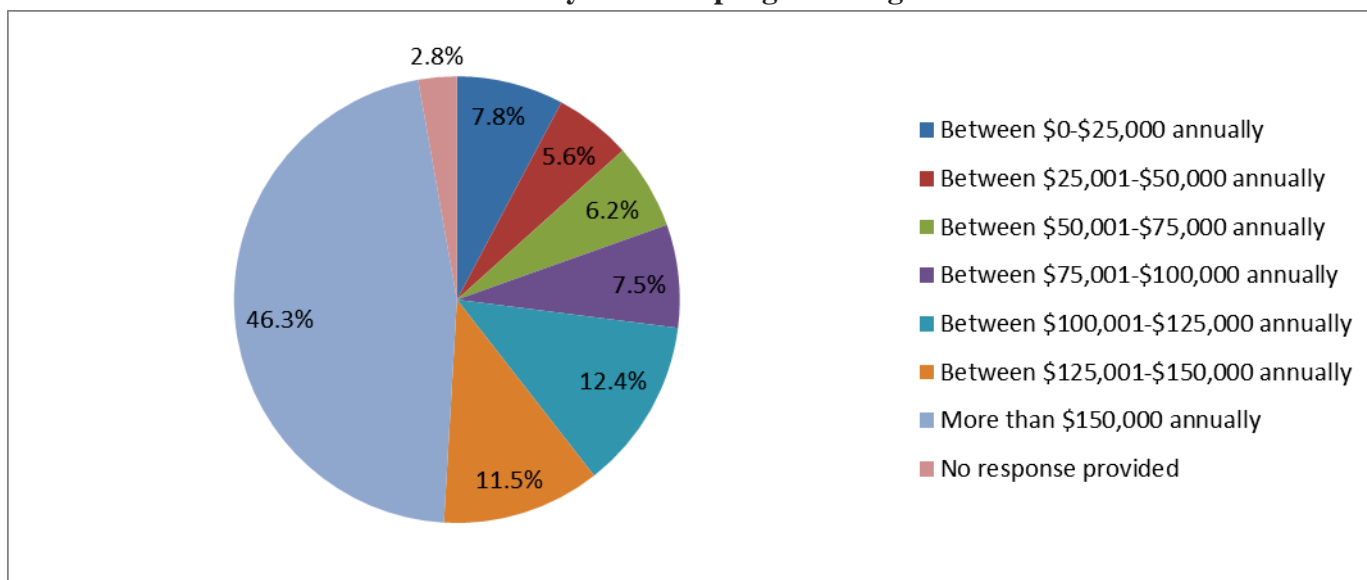
### **Among the 322 Respondents that Utilize ENT:**

**“Based on your current cost to use ENT, your estimated hourly cost of captioning, and the quantity of programming you deliver, approximately how much would switching from ENT to real-time captioning for all your news programming cost?”**

Between \$0-\$25,000 annually	25	7.8%
Between \$25,001-\$50,000 annually	18	5.6%
Between \$50,001-\$75,000 annually	20	6.2%
Between \$75,001-\$100,000 annually	24	7.5%
Between \$100,001-\$125,000 annually	40	12.4%
Between \$125,001-\$150,000 annually	37	11.5%
More than \$150,000 annually	149	46.3%
No response provided	9	2.8%

### **Among the 322 Respondents that Utilize ENT:**

**“Based on your current cost to use ENT, your estimated hourly cost of captioning, and the quantity of programming you deliver, approximately how much would switching from ENT to real-time captioning for all your news programming cost?”**



## Appendix

The following list summarizes the questions and potential responses that were included in the Enhanced ENT Survey. Respondents' selections and the data they provided were utilized to compile this report.

1. *Please select the call letters of the station for which you are responding. You may select multiple stations by holding down the "Ctrl" key while clicking on station selections.*
2. *Please enter the call letters of the station(s).* (This question only applied if the station call letters were not listed in the drop-down box in the first question).
3. *Please provide the following information regarding the person completing this survey.*
  - a. Respondents were asked to provide their name, phone number and e-mail address.
  - b. Respondents were also asked to re-enter the station call letters to verify the station call letters selected in the first question.
4. *Does your station produce local news programming?*
  - a. Yes
  - b. No
5. *Does your station use Enhanced Newsroom Technique (ENT) (i.e., captioning based on prompter and scripts) to provide captions for local news programming*
  - a. Yes
    - i. The respondent was instructed to continue if "yes" was selected.
  - b. No
    - i. The survey was marked complete if "no" was selected.
6. *Have you complied with the FCC's 2014 ENT Best Practices (Enhanced ENT) by implementing any of the following? Please select all options that apply.*
  - a. Assigning an in-station ENT coordinator.
  - b. Increasing training on scripting to improve ENT.
  - c. Scripting substantially all in-studio programming, including weather and sports.
  - d. Scripting pre-produced programming, to the extent possible.
  - e. Supplementing non-scripted live programming or breaking news through the use of crawls, textual information, or other means.
7. *Since June 30, 2014, have you received complaints about programming captioned using ENT?*
  - a. Yes
    - i. If "yes" was selected, the respondent was asked to quantify the number of complaints received since June 30, 2014.
  - b. No
8. *Has your station considered switching from ENT to real-time captioning?*
  - a. Yes
  - b. No

## Appendix (continued)

9. *What are the primary reasons your station has chosen to use Enhanced ENT to comply with the FCC's captioning regulations? Please check all options that apply.*
- a. Cost
  - b. Lack of quality captioners
  - c. Technical reasons
  - d. Quality of captions versus live captioning
  - e. Scheduling issues
  - f. Other (please specify)
10. *If you do not already use real-time captioning for other purposes (such as during emergencies), have you investigated the cost of real-time captioning (e.g. contacting one or more vendors or soliciting sponsorships)?*
- a. Yes
  - b. No
11. *Approximately how much money per hour do you estimate you would pay for real-time captioning (or how much money do you currently pay for real-time captioning)?*
- a. Less than \$70 per hour
  - b. \$70 - \$80 per hour
  - c. \$81 - \$90 per hour
  - d. \$91 - \$100 per hour
  - e. More than \$100 per hour
  - f. Don't know
12. *On average, how many hours of original news programming (not repeats) do you deliver each week?*
- a. 0 - 5 hours
  - b. 6 - 10 hours
  - c. 11 - 15 hours
  - d. 15 - 20 hours
  - e. More than 20 hours
13. *Based on your current cost to use ENT, your estimated hourly cost of captioning, and the quantity of programming you deliver, approximately how much would switching from ENT to real-time captioning for all your news programming cost?*
- a. Between \$0 - \$25,000 annually
  - b. Between \$25,001 - \$50,000 annually
  - c. Between \$50,001 - \$75,000 annually
  - d. Between \$75,001 - \$100,000 annually
  - e. Between \$100,001 - \$125,000 annually
  - f. Between \$125,001 - \$150,000 annually
  - g. More than \$150,000 annually